

Exhibit “B”

James M. Hanavan, State Bar No. 66097
Kristen E. Drake, State Bar No. 202827
CRAIGIE, McCARTHY & CLOW
540 Pacific Avenue
San Francisco, CA 94133
Telephone: (415) 732-7788
Facsimile: (415) 732-7783

Attorneys for Plaintiff Trevor Moss

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TREVOR MOSS,

Plaintiff,

v.

TIBERON MINERALS LTD.,

Defendant.

Case No.: C 07-2732- SC

**PLAINTIFF'S FIRST SET OF
INTERROGATORIES TO DEFENDANT
TIBERON MINERALS LTD.**

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1 PROPOUNDING PARTY: Plaintiff TREVOR MOSS
2 RESPONDING PARTY: Defendant TIBERON MINERALS LTD.
3 SET NO.: ONE (1)
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5 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

6 Pursuant to Federal Rule of Civil Procedure, Rule 33, plaintiff Trevor Moss requests that
7 defendant Tiberon Minerals Ltd. or any successor entity ("Tiberon") answer the following
8 interrogatories under oath within thirty (30) days after service of these interrogatories.

9 **INTERROGATORIES**

10 INTERROGATORY NO. 1: State the date on which Dragon Capital Management
11 Limited acquired ownership of Tiberon.

12 INTERROGATORY NO. 2: List the names and dates of any entity who acquired any
13 ownership interest in Tiberon after August 1, 2006.

14 INTERROGATORY NO. 3: Identify all PERSONS who were paid bonuses by the joint
15 venture for services performed in calendar year 2005, and identify for each any formula applied
16 to determine the amount of the bonus payment.

17 [For the purpose of this first set of interrogatories, the term "PERSON" means any natural
18 person or sole proprietorship which contracted to provide personal services under any
19 employment or consulting agreement with the Nui Phao Mining Joint Venture Company Ltd.
20 ("Nuiphaovica" or "the joint venture").]

21 INTERROGATORY NO. 4: Identify all PERSONS who were paid bonuses by the joint
22 venture for services performed in calendar year 2006, and identify for each any formula applied
23 to determine the amount of the bonus payment.

24 INTERROGATORY NO. 5: For each PERSON identified in YOUR response to
25 Interrogatory No. 3, identify any criteria used as a basis for determining the bonus.

26 [For the purpose of this first set of interrogatories, the terms "YOU" and "YOUR" means
27 the responding party described above, anyone acting on its behalf, its agents and/or employees, its
28 attorney(s) and its investigator(s).]

1 INTERROGATORY NO. 6: For each PERSON identified in YOUR response to
2 Interrogatory No. 4, identify any criteria used as a basis for determining the bonus.

3 INTERROGATORY NO. 7: For each of the board meeting minutes produced in response
4 to plaintiff's first set of document production requests served with these interrogatories, identify
5 the date on which the board meeting minutes were prepared.

6 INTERROGATORY NO. 8: For each of the board meeting minutes produced in response
7 to plaintiff's first set of document production requests served with these interrogatories, identify
8 the person or persons who prepared (i.e., typed) the board minutes.

9 INTERROGATORY NO. 9: Identify each of YOUR responses to Plaintiff's First Set of
10 Requests for Admission served with these interrogatories that is not an unqualified admission.

11 INTERROGATORY NO. 10: For each response to Plaintiff's First Set of Requests for
12 Admission identified in Interrogatory No. 9, above, state all facts upon which YOU base YOUR
13 response.

14 INTERROGATORY NO. 11: For each response to Plaintiff's First Set of Requests for
15 Admission identified in Interrogatory No. 9, above, state the names, addresses and telephone
16 numbers of all PERSONS who have knowledge of the facts upon which YOU base YOUR
17 response.

18 INTERROGATORY NO. 12: For each response to Plaintiff's First Set of Requests for
19 Admission identified in Interrogatory No. 9, above, identify all DOCUMENTS that support
20 YOUR response and state the name, address and telephone number of the PERSON who has each
21 DOCUMENT.

22 [For the purpose of this first set of interrogatories, the terms "DOCUMENT" or
23 "DOCUMENTS" means all "writings" and "photographs" as those terms are defined in Federal
24 Rules of Evidence, Rule 1001.]

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2 Dated: October 19, 2007

CRAIGIE, McCARTHY & CLOW

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5 By: Kristen E. Drake
6 Attorneys for Plaintiff Trevor Moss
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CRAIGIE, McCARTHY & CLOW
Telephone: 415/732-7788 · Facsimile: 415/732-7783

PROOF OF SERVICE

I, Kristen Drake, certify and declare as follows:

I am over the age of 18 years, and not a party to this action. My business address is Craigie, McCarthy & Clow, 540 Pacific Avenue, San Francisco, California 94133.

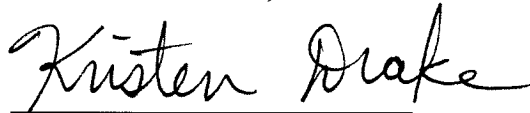
X **BY MAIL:** I am readily familiar with the business practice at my place of business for collection and processing of correspondence for mailing with the United States Postal Service. Correspondence so collected and processed is deposited with the United States Postal Service that same day in the ordinary course of business. On October 19, 2007, at my place of business at Craigie, McCarthy & Clow, 540 Pacific Avenue, San Francisco, California 94133, I placed the document(s) described on the attached document list for deposit in the United States Postal Service in a sealed envelope, with postage fully prepaid, addressed to those persons listed in the attached service list.

_____ **BY FAX:** On October 19, 2007, I transmitted from a facsimile transmission machine, whose telephone number (415) 732-7783, the following document(s) described on the attached document list and a copy of this declaration to the recipient and their fax number as indicated on the attached service list. The transmission was reported as complete without error by a transmission report issued by the facsimile transmission machine immediately following the transmission. A true and correct copy of the transmission report may be requested from the undersigned by calling (415) 732-7788.

_____ **BY FEDERAL EXPRESS:** On October 19, 2007, I deposited in a box or other facility regularly maintained by Federal Express, an express service carrier, or delivered to a courier or driver authorized by this express service carrier to receive documents, a copy of the document(s) described on the attached document list, together with a copy of this declaration, in an envelope designated by the this express service carrier, with delivery fees paid or provided for, addressed to those persons listed on the attached service list.

_____ **BY HAND DELIVERY:** On October 19, 2007, I caused a copy of the document(s) described on the attached document list, together with a copy of this declaration, to be hand delivered, with delivery fees paid or provided for, to those persons listed on the attached service list.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at San Francisco, California on October 19, 2007.


Kristen Drake

Document and Service Lists Attached

DOCUMENT LIST

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT TIBERON MINERALS LTD.

SERVICE LIST

David J. Brown
MBV LAW LLP
855 Front Street
San Francisco, CA 94111
Facsimile: (415) 989-5143
Attorneys for Defendant Tiberon Minerals Ltd.